

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re: PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.¹

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INFORMATIVE
**MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD REGARDING AUGUST 4–5, 2021 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for August 4-5, 2021, Omnibus Hearing* [Case No. 17-3283, ECF No. 17522], the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² the Oversight Board respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The following parties will appear telephonically to address questions and comments, if any, related to the Oversight Board's status report: Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP.

2. Joshua A. Esses of Proskauer Rose LLP will appear telephonically and seek to be heard on *The DRA Parties' Amended Motion and Memorandum of Law in Support of Their Request for Adequate Protection or Relief from the Automatic Stay* [Case No. 17-3283, ECF No. 16276; Case No. 17-3567, ECF No. 998].

3. Scott P. Cooper of Proskauer Rose LLP will appear telephonically and seek to be heard on *Cobra Acquisitions LLC's Motion to Lift the Stay Order* [Case No. 17-3283, ECF No. 16328; Case No. 17-4780, ECF No. 2428].

4. Martin J. Bienenstock, Brian Rosen, and/or Joshua A. Esses of Proskauer Rose LLP will appear telephonically and seek to be heard on *Notice of Hearing and Motion of Individual Bondholder for an Order Directing the Appointment of a Committee to Represent Retail Investors in the Eight Retail Investor Classes in Connection with the Proposed Plan and in Proceedings Related to Confirmation, filed by Peter C. Hein* [Case No. 17-3283, ECF No. 17221].

5. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Fourteenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System to the Government of the Commonwealth of Puerto Rico to Claims for Which the Debtors Are Not Liable* [Case No. 17-3283, ECF No. 16638].

6. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Twenty-First Omnibus Objection*

(Substantive) of the Commonwealth of Puerto Rico to Claims for Which the Commonwealth Is Not Liable [Case No. 17-3283, ECF No. 16647].

7. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Thirty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Public Buildings Authority to Duplicate Claims* [Case No. 17-3283, ECF No. 17104].

8. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Fortieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Duplicate Claims* [Case No. 17-3283, ECF No. 17087].

9. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Forty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Misclassified Claims* [Case No. 17-3283, ECF No. 17108].

10. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Forty-Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Misclassified and Overstated Claims* [Case No. 17-3283, ECF No. 17109], *Three Hundred Forty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to*

Duplicate Litigation Claims [Case No. 17-3283, ECF No. 17092], and *Three Hundred Fifty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Partial Duplicate Litigation Claims* [Case No. 17-3283, ECF No. 17112].

11. Laura Stafford and/or Brian Rosen of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Three Hundred Fifty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Duplicate and No Liability Bond Claims* [Case No. 17-3283, ECF No. 17093].

12. Martin Bienenstock, Brian Rosen, Joshua A. Esses, Scott P. Cooper, and Laura Stafford reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

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WHEREFORE, the parties respectfully request that the Court take notice of the foregoing.

Dated: July 30, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock
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